Guidelines for the U.S. Coast Guard Oil Spill Removal Organization Classification Program

U.S. Department
of Transportation

**United States
Coast Guard**

Commandant
United States Coast Guard

2100 Second Street, S.W.
Washington, D.C. 20593-0001
Staff Symbol: G-M
Phone: (202) 267-2200
FAX: (202) 267-4839

16465
27 April 2001

Introductory Letter from RADM R.C. North
Assistant Commandant for Marine Safety and Environmental Protection

Attached are the revised guidelines for conducting the Coast Guard's Oil Spill Removal Organization (OSRO) program. The Guidelines for Classifying Oil Spill Removal Organizations dated April 29, 1997, are no longer in effect.

The OSRO classification program was created by the Coast Guard to assist facility and vessel response plan holders in the writing of their plans. The sole regulatory benefit that plan holders receive from utilizing Coast Guard classified OSRO's is the relief from providing voluminous detailed lists of response resources in their plans. The OSRO classification program was created to be and remains a voluntary program. Volunteers simply receive their classifications as outlined in these guidelines but are neither endorsed, certified or recommended by the Coast Guard.

We continue to stress that using a Coast Guard classified OSRO does not in any way relieve plan holders of the responsibility to ensure that their specific response needs are met. The revised classification guidelines provide an indication of an OSRO's response capability by Captain of the Port (COTP) zone. They do not, however, represent a "one size fits all" solution.

Several improvements have been implemented in this latest version of the OSRO guidelines. Major changes include:

- The "A" classification for Average Most Probable Discharge (AMPD) response has been removed. Responsibility for ensuring and certifying AMPD coverage falls to the plan holder.
- Required quantities of protective boom have been updated to bring them into alignment with the requirements in 33 CFR Part 155.
- The tables for required quantities of containment boom have been replaced with new criteria, which is based on the number of skimming systems identified on an OSRO's application to meet Effective Daily Recovery Capacity (EDRC) requirements.
- The introduction of a waiver process to address OSRO's which service facilities only and not vessels. The waiver would permit these OSRO's to receive their classification based upon the amount of protective boom required by the Area Contingency Plan for a particular COTP zone in lieu of meeting the often larger vessel requirements for protection boom.
- Equipment availability (dedicated, non-dedicated, Letter of Intent) offset times have been created and are utilized when calculating equipment response times for classification.

- With the exception of non-dedicated barges, the old 2:1 non-dedicated/dedicated equipment requirement has been eliminated.

- Several Alternate Classification Cities (ACCs) have been added to close gaps in coverage for some COTP zones.

- Operating environments have been changed to areas in order to bring the OSRO guidelines more in line with the regulations and PREP guidelines. In these new guidelines the ocean area is further distinguished with nearshore, offshore and open ocean definitions.

- Additional emphasis has been placed on training and exercises of response resources consistent with the PREP guidelines.

- Enhancements to the verification process have been made in order to assess a "systems" capability to meet response criteria.

- Increased involvement of COTPs in the OSRO classification process.

The Coast Guard appreciates the high level of interest shown by plan holders, OSRO's, state and federal agencies, and many others in the revision of these guidelines. Your input has been invaluable and has assisted us greatly in producing what I consider to be a much-improved set of classification guidelines. These guidelines, and the cooperative manner in which they were developed, represents a commitment which will allow us to better preserve our environment for generations to come.

Any questions regarding the new OSRO guidelines should be directed to the U.S. Coast Guard National Strike Force Coordination Center at (252) 331-6000.

Sincerely,

R.C. NORTH
Rear Admiral, U.S. Coast Guard
Assistant Commandant for Marine
Safety and Environmental Protection

Table of Contents

List of Tables

List of Figures

Executive Summary

Required Response Plans	Section 4202 of the Oil Pollution Act of 1990 (OPA 90) amended section 311(j) of the Federal Water Pollution Control Act (FWPCA) to require the preparation and submission of response plans by the owners or operators of certain oil-handling facilities and for all vessels defined as "tank vessels" under 46 U.S. Code (USC) 2101 (hereafter referred to as plan holders). An owner or operator of such a facility or tank vessel is required to submit a response plan that, among other things, identifies and ensures by contract or other means approved by the President, the availability of private personnel and equipment necessary to remove, to the maximum extent practicable, a worst case discharge (WCD, including a discharge resulting from fire or explosion), and to mitigate or prevent a substantial threat of such a discharge.
Complex Response	The system for assembling, mobilizing, and controlling these resources is extremely complex. To meet the statutory requirements, each response plan must identify the means for accomplishing these tasks.
Voluntary Classification Program	The Coast Guard created the voluntary oil spill removal organization (OSRO) classification program so that facility and tank vessel response plan holders could list OSROs in response plans in lieu of providing extensive detailed lists of response resources if "…the organization has been classified by the Coast Guard and their capacity has been determined to equal or exceed the response capability needed by the [plan holder]…." This was, and still is, the only regulatory benefit that plan holders receive from using Coast Guard-classified OSROs. OSROs and plan holders participate in and use the classification program on a strictly voluntary basis.

Executive Summary, continued

Classified by Core Equipment	OSROs are classified based on "core equipment" that they own, contract for, or have arranged by other means. This core equipment includes boom, recovery, storage, and support equipment such as response vessels and response personnel. The cooperation of OSROs, plan holders, and state and federal agencies has been essential to the development of a program that allows all stakeholders to meet the intent of OPA 90.
Plan Holder Responsibility	Using a Coast Guard-classified OSRO does not in any way relieve plan holders of the responsibility of ensuring that their specific response needs are met. These classification guidelines provide a good indicator of an OSRO's response capability; however, they do not represent a "one-size-fits-all" solution.
Classification Program Success	The thrust of OPA 90 is to develop private sector responsibility for all aspects of oil spill response planning. Realistic response capability is a crucial link in this process, so the emphasis on a comprehensive OSRO classification process is well placed. These guidelines give plan holders a much better tool to use in gauging a classified OSRO's potential to meet specific planning requirements.
Standard Guidelines for Response	The OSRO classification process represents standard guidelines by which the Coast Guard and plan holders can evaluate an OSRO's capability to respond to and recover oil spills of various sizes. Plan holders that arrange for the services of a Coast Guard-classified OSRO do not have to list that OSRO's specific response resources in their plans.
Classification Does Not Guarantee Performance	Being a Coast Guard-classified OSRO, however, **does not guarantee** the performance of that OSRO during an oil spill. Identifying a Coast Guard-classified OSRO as part of a facility response plan (FRP) or tank vessel response plan (VRP) submission does not relieve plan holders of the primary responsibility to ensure that their OSROs are able to respond effectively and to provide the complete range of capability required by the FRP or VRP regulations.
Guidelines for Program Participants and Nonparticipants	While these guidelines specifically apply to OSROs participating in the Coast Guard classification program, similar criteria will be used to assess the capability of OSROs identified in response plans that do not participate in the classification program.

Chapter 1
Background

Overview

Introduction

The OSRO classification program was developed to complement the response plan development and review processes by systematically classifying OSROs. The program is voluntary, and classification does not guarantee performance. These guidelines for the OSRO Classification Program have been reviewed and revised periodically.

In This Chapter

This Chapter contains the following information:

Purpose

Required Response Plans and the Coast Guard Classification Program

The OSRO classification process was developed to facilitate the preparation and review of FRPs and VRPs.

Section 4202 of OPA 90 amended Section 311(j) of the FWPCA to require the preparation and submission of response plans by the owners or operators of certain oil-handling facilities and of all vessels defined as "tank vessels" under 46 USC 2101 (hereafter referred to as plan holders).

Systematic Classification

The primary purpose of this program is to provide a systematic way to classify OSROs. Once classified, plan holders can list them by name and classification as an alternative to listing extensive resources in their FRPs and VRPs (33 Code of Federal Regulations (CFR) 154.1035 (e)(3)(iii), 33 CFR 155.1035 (i)(8), and 33 CFR 155.1040(j)(8)).

Classification Does Not Guarantee Performance

An OSRO classification does not guarantee the performance of an OSRO, nor does the use of a Coast Guard-classified OSRO in a plan relieve plan holders of their ultimate statutory and regulatory responsibility to ensure the adequacy of the spill response resources identified in a response plan.

Applicability

Voluntary Participation

OSRO classification is a strictly voluntary process in which OSROs can participate and plan holders can utilize for planning purposes.

An OSRO does not have to be classified and plan holders do not have to limit their response resources to Coast Guard-classified OSROs.

However, by participating in the classification program, an OSRO agrees to meet all program requirements. In addition, similar criteria will be used by the Coast Guard to evaluate the capability of OSROs identified in response plans but not participating in the classification program.

History of These Guidelines

Introduction

To facilitate response plan development, the Coast Guard first published the OSRO classification guidelines in 1992.

Since the last significant revision in 1995, the guidelines have undergone subtle changes to accommodate various shortfalls identified by program managers and stakeholders alike.

Thirteen separate newsletters were published announcing these changes, eight of which were incorporated into the last revision of the guidelines in 1997. Since 1997, the guidelines have remained stable.

OSRO classifications were intended to be used strictly as a response "planning tool" that would allow plan holders to identify OSROs that could meet their response needs, as outlined by the regulations.

To ensure, at a minimum, that an OSRO classification represents as accurately as possible an OSRO's response capability, further revisions to the guidelines were needed. These revisions were designed to ensure that the intent of the planning regulations was better represented by each assigned Coast Guard classification.

New in this Revision

Over the last 5 years, numerous stakeholders have provided feedback concerning such topics as "real" response times, as well as dedicated/nondedicated and owned/contracted equipment and how this affects response capabilities. These types of issues, along with a few shortfalls that did not address the underlying regulatory requirements that are to be met by plan holders, have been addressed in this revision.

This revision also incorporates the "cap increase" for WCD oil recovery and temporary storage capacity (TSC) that became effective on April 5, 2000.

Chapter 2
Description of Classifications

Overview

Introduction

OSROs are classified based on the location of response resources and an assessment of the ability to mobilize those resources to the Captain of the Port (COTP) city or Alternate Classification City (ACC). There are equipment standards and response times specific to each operating area within a COTP zone. Additional requirements are outlined for the Prince William Sound, Alaska COTP zone and shallow water environments. This chapter also discusses exercises, personnel training, and equipment maintenance specific to the OSRO classification program.

In This Chapter

This Chapter contains the following information:

Resource Requirements

Core Resources

Core resources are separated into five categories:

1. Protective boom
2. Effective daily recovery capacity (EDRC) and containment boom
3. Temporary storage capacity (TSC)
4. Response vessels
5. Personnel

NOTE: Both protective and containment boom are measured in feet. EDRC is measured in barrels per day (bbls/day), while TSC is measured in barrels (bbls).

Protective Boom

The VRP regulation (33 CFR 155, Appendix B, Table 2) requires a plan holder to have available a specific amount of boom for shoreline protection purposes for maximum most probable discharges (MMPDs) and WCDs.

For classification purposes, it is assumed that the OSRO has both vessel and facility clients. Since the protective boom requirements for vessel response plan holders (33 CFR 155 Appendix B, para 5.6) are more restrictive and specific, these requirements are used for OSRO classification. If an OSRO certifies that it only serves facility customers, it can submit, in writing to the National Strike Force Coordination Center (NSFCC), a request to base its protective boom requirements on the amount specified in Area Contingency Plans (ACPs) and FRP for the relevant COTP zone in accordance with 33 CFR 154 Appendix B, para 5.6.

EDRC and Containment Boom

EDRC, containment boom, and response vessels are interrelated for OSRO classifications. For planning purposes, EDRC credit is counted only toward an OSRO's classification if there is, at a minimum, 300 feet of containment boom available to be deployed in the applicable operating area to complete the "skimming system." Also, per the FRP and VRP regulations, an OSRO must have 1,000 feet of containment boom in addition to the 300 feet per skimming system.

Response vessels need to be identified to support the recovery devices that also meet the FRP and VRP time requirements outlined in these guidelines.

Continued on next page

Resource Requirements, continued

EDRC and Containment Boom, *continued*	**NOTE:** OSROs should use at, a minimum, the boom amounts recommended by a skimming system's manufacturer. On average, manufacturer boom amounts are 300 feet. If the skimmer is designed in a way that containment boom needed is less than 300 feet, an OSRO can request in writing a waiver from the NSFCC for the amount that is recommended by the manufacturer.
TSC	An OSRO must identify TSC equaling twice the EDRC included in a classification application (33 CFR 154, Appendix C, para 9.2 and 33 CFR 155, Appendix B, para 9.2). An OSRO's classification is limited by the lowest-rated component of the recovery system. TSC and EDRC are interrelated. For example, if an OSRO has 10,000 bbls/day EDRC but only has available 14,000 bbls TSC, then its recovery capacity is limited to 7,000 bbls/day (one half of the available TSC capability).
Fixed Storage Tankage Ashore	Fixed tankage can be identified to meet the TSC requirements in limited circumstances. • Accepted only for OSRO classifications covering the rivers/canals, Great Lakes, and inland operating areas. • Allowed for up to 35% of an OSRO's TSC for the rivers/canals, Great Lakes, and inland operating areas provided that the OSRO certifies that it can transport recovered oil to the fixed tankage ashore and sustain the required EDRC. • Not allowed in the nearshore, offshore, or open ocean operating areas.
Vacuum Trucks	• Not permitted for EDRC and TSC credit in the nearshore, offshore, and open ocean operating areas. • Limited to a maximum of 45% EDRC and TSC in the rivers/canals, Great Lakes, and inland operating areas unless an OSRO provides the proper documentation from the applicable COTP authorizing the on-deck transport of a vehicle(s) with EDRC and TSC capability for all operating areas. • Each vacuum truck receiving EDRC credit requires 300 feet of containment boom.

Continued on next page

Resource Requirements, continued

Response Vessels

Response vessels are integral to every response. Vessels intended for response services must be clearly identified in the application process.

Although response vessels are not calculated programmatically into a classification, the NSFCC reviews available response vessels. If a shortfall is perceived, further discussion with the OSRO is warranted before a classification is considered.

Only response vessels that meet the response time requirements outlined in these guidelines by tier will be considered. All response vessels identified must meet applicable Coast Guard regulations and policy guidelines (e.g., navigation lights, safety equipment, life vests).

Personnel

The number of personnel needed to support a response depends on numerous factors and cannot be easily measured.

- For the OSRO classification program, the number of personnel required for a classification for each COTP city or ACC is based on the resource sites used to gain a classification for that particular COTP.
- During the application process, an OSRO must identify the number of personnel required to mobilize and operate the resources at each of its resource sites.
- Each site that meets the time requirements for a classification must have its personnel requirements totaled for that classification.
- If sufficient personnel have been identified by the OSRO that meet the response time requirements and concurrently can deploy and operate all equipment necessary for that level of classification, then an OSRO qualifies for that classification.

Counting Resources for Classification

Resources that are owned, contracted, or arranged by other means, plus dedicated and nondedicated resources, may be counted for classification.

M (MMPD) and W1 (WCD Tier 1) Classifications

Only resources located at equipment sites capable of being mobilized and enroute to the scene of a spill within 2 hours of notification are counted toward M and W1 classifications.

Because of the potential for nondedicated resources to be committed to other functions, only dedicated resources are presumed to be able to mobilize within these time requirements.

Continued on next page

Resource Requirements, continued

W2 (WCD Tier 2) and W3 (WCD Tier 3) Classifications

Any type resource—owned or contracted, dedicated or nondedicated—is allowed for W2 and W3 classification.

Dedicated vs. Nondedicated Resources

OSROs may identify either dedicated or nondedicated resources to obtain a classification. Since nondedicated resources may not be available to respond immediately, longer notification/mobilization times are assigned to these resources to account for their possible nonavailability.

Since nondedicated tank barges used for TSC credit may operate significant distances from their classification resource sites, an OSRO must further ensure the availability of nondedicated barges by contract or other approved means in quantities equal to twice what the OSRO requires of the dedicated resources.

Owned, Contracted, or Arranged by Other Means

FRP and VRP regulations require plan holders to ensure the availability of response resources by contract or other approved means.

OSROs must meet these same requirements for all response resources (dedicated, nondedicated, owned, and nonowned equipment and personnel) that they claim for classification purposes. At a minimum, this requires a letter of intent (LOI) from the owner of a resource.

Response Plan Regulations and the Classification Program

FRP and VRP regulations specify the quantity of resources required for specific planning volumes.

The requirements are categorized as the MMPD and WCD (see Table 1 for planning volumes). WCD is divided into Tiers 1, 2, and 3.

Table 1. Planning Volumes for Discharge Categories

Category	Facility	Tank Vessel
MMPD	1,200 bbls or 10% of WCD	2,500 bbls or 10% of WCD
WCD	Largest foreseeable oil discharge	Entire loss of oil cargo

MMPD and WCD are based on a calculation using a facility's largest foreseeable oil discharge or a tank vessel's cargo volume.

Classifying OSROs

The program uses a combination of planning volume capacities and other information found in FRP and VRP regulations to classify OSROs.

For the OSRO classification program, the classifications of M, W1, W2, and W3 are equivalent to MMPD and WCD Tiers 1, 2, and 3, respectively.

Continued on next page

Resource Requirements, continued

Operating Areas

Manufacturers design boom, oil recovery devices, and TSC equipment with certain operating areas in mind. In the response plan regulations, these operating areas are identified as rivers/canals, Great Lakes, inland, nearshore, offshore, and open ocean (see Glossary). The OSRO classification program classifies OSROs based on these areas.

In this Chapter, the Section on Specific Classification Standards by Operating Area lists specific requirements for boom, EDRC, and TSC for each of these areas.

Boom, EDRC, and TSC Quantities

To receive an M, W1, W2, or W3 classification, an OSRO must meet all boom, EDRC, and TSC amounts to obtain a single classification, and each classification is determined independently for each operating area (see Tables 2–4).

Table 2. Boom Amounts in Feet for OSRO Classifications

Area	Configuration	M	W1	W2	W3
Rivers/Canals	Protective	4,000	25,000	25,000	25,000
Great Lakes	Protective	6,000	30,000	30,000	30,000
Inland	Protective	6,000	30,000	30,000	30,000
Nearshore	Protective	8,000	30,000	30,000	30,000
Offshore	Protective	8,000	15,000	15,000	15,000
Open Ocean	Protective	0	0	0	0

Table 3. EDRC Amounts in Barrels per Day for OSRO Classifications

Area	M	W1	W2	W3
Rivers/Canals	1,200	1,875	3,750	7,500
Great Lakes	1,200	6,250	12,500	25,000
Inland	1,200	12,500	25,000	50,000
Nearshore	1,200	12,500	25,000	50,000
Offshore	1,200	12,500	25,000	50,000
Open Ocean	1,200	12,500	25,000	50,000

Table 4. TSC Amounts in Barrels for OSRO Classifications

Area	M	W1	W2	W3
Rivers/Canals	2,400	3,750	7,500	15,000
Great Lakes	2,400	12,500	25,000	50,000
Inland	2,400	25,000	50,000	100,000
Nearshore	2,400	25,000	50,000	100,000
Offshore	2,400	25,000	50,000	100,000
Open Ocean	2,400	25,000	50,000	100,000

Response Times

General

In addition to resource quantities, OSROs are required to meet certain response times (33 CFR 154.1045(d)–(f) and 33 CFR 155.1050(a)–(h)). The response times for classification were derived from the regulations and standardized for classification through a series of workshops (33 CFR 154, Appendix C, para 2.6 and 33 CFR 155 Appendix B, para 2.6), and are summarized in Table 5.

Summary of Response Times

Table 5. Response Times in Hours for Boom, EDRC, and TSC Resources

Area	Facility or Tank Vessel	M	W1	W2	W3
Rivers/Canals	Fac	12	12	36	60
	Vsl	24	24	48	72
	FHVP	6	6	30	54
	VHVP	12	12	36	60
Great Lakes	Fac	6	12	36	60
	Vsl	12	18	42	66
	FHVP	N/A	N/A	N/A	N/A
	VHVP	N/A	N/A	N/A	N/A
Inland	Fac	12	12	36	60
	Vsl	24	24	48	72
	FHVP	6	6	30	54
	VHVP	12	12	36	60
Nearshore	Fac	12	12	36	60
	Vsl	24	24	48	72
	FHVP	6	6	30	54
	VHVP	12	12	36	60
Offshore	Fac	12	12	36	60
	Vsl	24	24	48	72
	FHVP	6	6	30	54
	VHVP	12	12	36	60
Open Ocean	Fac	12	12	36	60
	Vsl	24	24	48	72
	FHVP	6	6	30	54
	VHVP	12	12	36	60

Note: Fac, facilities; Vsl, tank vessels; FHVP, facility higher volume ports; VHVP, tank vessel higher volume ports.

Response Times for Facilities and Tank Vessels

The Coast Guards classification program uses two major categories of response times—facilities and tank vessels—because of the differences between the respective FRP and VRP regulations.

Continued on next page

Response Times, continued

Higher Volume Port Areas	If a COTP zone contains a higher volume port (see Glossary), response times are more stringent per the regulations.
Classified for COTP City or ACC	To receive a classification for a specific COTP city or ACC, an OSRO must ensure that the resources outlined in Tables 2–4 are able to meet the response times specified in Table 5.
Computing Response Times	The response plan regulations require the plan holder to include the time for notification, mobilization, and travel when computing response times (33 CFR 154, Appendix C, para 2.6 and 33 CFR 155, Appendix B, para 2.6). Therefore, the time needed for a resource to move from its staging site to a classification point is the sum of the notification, mobilization, and travel times. The OSRO classification program calculates response times by combining the notification/mobilization times and travel times of the resource sites used for a specific classification.
Mobilization	Mobilization is defined as the time it takes to get the resources assembled and prepared at the staging site. Mobilization begins when notification ends and ends when the resources are ready to move off-site.
Resource Notification/ Mobilization Time	The time to notify and mobilize resources at a site is largely based on how much control the OSRO has over those resources. For this reason, different mobilization times are used for calculating OSRO classifications based on resource status (see Table 6). OSROs are required to provide information on the status of each of their response resources during the application process. By using Table 6, an OSRO determines the notification/mobilization time for each response resource included in its application.

Continued on next page

Response Times, continued

Summary of Resource Notification/ Mobilization Times

Table 6. Resource Notification/Mobilization Response Times in Hours

Resource Status	Response Personnel Availability	
	On-Site (OS)[1]	Recall (R)[2]
Owned/Dedicated (O/D)	1	2
Contract/Dedicated (C/D)	1.5	2.5
Letter of Intent/Dedicated (LOI/D)	2	3
Owned/Nondedicated (O/ND)	2.5	3.5
Contract/Nondedicated (C/ND)	3	4
Letter of Intent/Nondedicated (LOI/ND)	3.5	4.5

Notes: Full-time personnel are a dedicated resource; part-time personnel are a nondedicated resource. Table includes 0.5 hours between discovery of discharge and notification of OSRO.

[1] On-site means a 24-hour staffed resource site.

[2] Available on recall means personnel recalled on beeper or phone tree.

Level of Control

If a resource is owned by an OSRO, then the OSRO has high control. If the resources are contracted or arranged by other means, then the OSRO has less control.

The amount of control also depends on whether the resource is dedicated or nondedicated. Dedicated resources are more likely to have a quicker notification/mobilization time then those that are nondedicated since the dedicated resources are not committed to other activities and therefore are more readily available.

Resource sites that are owned and dedicated are presumed to be more capable of mobilizing faster than those that are contracted and nondedicated.

Computing Travel Times

Travel times are computed using standard speeds (as noted below), and the highway or water distance between an OSRO site and specified geographic locations within the COTP zone.

Travel speeds of 35 miles per hour (mph) for land and 5 knots (kts) for water are used for OSRO classification calculations. These values are from the response plan regulations (33 CFR 154, Appendix C, para 2.6 and 33 CFR 155, Appendix B, para 2.6). The distance is divided by the speed to determine the travel time:

$$\text{Travel time} = \frac{\text{Distance between OSRO site and COTP city/ACC}}{\text{35 mph or 5 kts}}$$

Computing Site Response Times

The total response time assigned to each site is the sum of the notification/mobilization times from Table 6, and the travel time to the geographic points mentioned above.

Specific Classification Standards by Operating Area

Rivers/Canals

Minimum equipment standards and maximum response times for classifying OSROs for planned response to spills in the rivers/canals operating area are summarized in Table 7, which is derived from Tables 2–4. All equipment to be used in this area must be capable of operating in 1-foot wave heights.

Table 7. Equipment Standards and Response Times for the Rivers/Canals Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Tank Vessel Response Times (hours)
M (1,200 bbls/day recovery)					
4,000	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
W1 (1,875 bbls/day recovery)					
25,000	1,000 plus 300 per skimming system	1,875	3,750	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
W2 (3,750 bbls/day recovery)					
25,000	1,000 plus 300 per skimming system	3,750	7,500	30 for higher volume ports 36 for all other locations	36 for higher volume ports 48 for all other locations
W3 (7,500 bbls/day recovery)					
25,000	1,000 plus 300 per skimming system	7,500	15,000	54 for higher volume ports 60 for all other locations	60 for higher volume ports 72 for all other locations

Boom Properties

Boom height (draft plus freeboard) (inches)	6–18
Reserve buoyancy-to-weight ratio	2:1
Total tensile strength (lbs)	4,500
Skirt fabric tensile strength (lbs)	200
Skirt fabric tear strength (lbs)	100

Specific Classification Standards by Operating Area, continued

Great Lakes

Minimum equipment standards and maximum response times for classifying an OSRO for planned response to spills in the Great Lakes operating area are summarized in Table 8, which is derived from Tables 2–4. All equipment to be used in this operating area must be capable of operating in 4-foot wave heights.

Table 8. Equipment Standards and Response Times for the Great Lakes Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Tank Vessel Response Times (hours)
M (1,200 bbls/day recovery)					
6,000	1,000 plus 300 per skimming system	1,200	2,400	6	12
W1 (6,250 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	6,250	12,500	12	18
W2 (12,500 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	12,500	25,000	36	42
W3 (25,000 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	25,000	50,000	60	66

Boom Properties

Boom height (draft plus freeboard) (inches)	18–42
Reserve buoyancy-to-weight ratio	2:1
Total tensile strength (lbs)	15,000–20,000
Skirt fabric tensile strength (lbs)	300
Skirt fabric tear strength (lbs)	100

Specific Classification Standards by Operating Area, continued

Inland

Minimum equipment standards and maximum response times for classifying an OSRO for planned response to spills in the inland operating area are summarized in Table 9, which is derived from Tables 2–4. All equipment to be used in this operating area must be capable of operating in 3-foot wave heights.

Table 9. Equipment Standards and Response Times for the Inland Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Tank Vessel Response Times (hours)
M (1,200 bbls/day recovery)					
6,000	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
W1 (12,500 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	12,500	25,000	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
W2 (25,000 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	25,000	50,000	30 for higher volume ports 36 for all other locations	36 for higher volume ports 48 for all other locations
W3 (50,000 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	50,000	100,000	54 for higher volume ports 60 for all other locations	60 for higher volume ports 72 for all other locations

Boom Properties

Boom height (draft plus freeboard) (inches)	18–42
Reserve buoyancy-to-weight ratio	2:1
Total tensile strength (lbs)	15,000–20,000
Skirt fabric tensile strength (lbs)	300
Skirt fabric tear strength (lbs)	100

Specific Classification Standards by Operating Area, continued

Nearshore

Minimum equipment standards and maximum response times for classifying an OSRO for planned response to spills in the nearshore operating area (classified as the ocean operating environment) are summarized in Table 10, which is derived from Tables 2–4. With the exception of shoreline protection boom, all equipment to be used in this operating area must be capable of operating in 6-foot wave heights.

Table 10. Equipment Standards and Response Times for the Nearshore Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Tank Vessel Response Times (hours)
M (1,200 bbls/day recovery)					
8,000	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
W1 (12,500 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	12,500	25,000	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
W2 (25,000 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	25,000	50,000	30 for higher volume ports 36 for all other locations	36 for higher volume ports 48 for all other locations
W3 (50,000 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	50,000	100,000	54 for higher volume ports 60 for all other locations	60 for higher volume ports 72 for all other locations

Boom Properties

	Containment	Shoreline Protection
Boom height (draft plus freeboard)(inches)	≥ 42	≥ 18
Reserve buoyancy-to-weight ratio	3:1 to 4:1	> 2:1
Total tensile strength (lbs)	> 20,000	> 15,000
Skirt fabric tensile strength (lbs)	500	> 300
Skirt fabric tear strength (lbs)	125	> 100

Specific Classification Standards by Operating Area, continued

Offshore

Minimum equipment standards and maximum response times for classifying an OSRO for planned response to spills in the offshore operating area (classified as the ocean operating environment) are summarized in Table 11, which is derived from Tables 2–4. All equipment to be used in this operating area must be capable of operating in 6-foot wave heights.

Table 11. Equipment Standards and Response Times for the Offshore Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Tank Vessel Response Times (hours)
M (1,200 bbls/day recovery)					
8,000	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
W1 (12,500 bbls/day recovery)					
15,000	1,000 plus 300 per skimming system	12,500	25,000	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
W2 (25,000 bbls/day recovery)					
15,000	1,000 plus 300 per skimming system	25,000	50,000	30 for higher volume ports 36 for all other locations	36 for higher volume ports 48 for all other locations
W3 (50,000 bbls/day recovery)					
15,000	1,000 plus 300 per skimming system	50,000	100,000	54 for higher volume ports 60 for all other locations	60 for higher volume ports 72 for all other locations

Boom Properties

	Containment	Shoreline Protection
Boom height (draft plus freeboard)(inches)	≥ 42	≥ 18
Reserve buoyancy-to-weight ratio	3:1 to 4:1	> 2:1
Total tensile strength (lbs)	> 20,000	> 15,000
Skirt fabric tensile strength (lbs)	500	> 300
Skirt fabric tear strength (lbs)	125	> 100

Specific Classification Standards by Operating Area, continued

Open Ocean

Minimum equipment standards and maximum response times for classifying an OSRO for planned response to spills in the open ocean operating area (classified as the ocean operating environment) are summarized in Table 12, which is derived from Tables 2–4. All equipment to be used in this operating area must be capable of operating in 6-foot wave heights.

Table 12. Equipment Standards and Response Times for the Open Ocean Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Tank Vessel Response Times (hours)
M (1,200 bbls/day recovery)					
No requirements	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
W1 (12,500 bbls/day recovery)					
No requirements	1,000 plus 300 per skimming system	12,500	25,000	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
W2 (25,000 bbls/day recovery)					
No requirements	1,000 plus 300 per skimming system	25,000	50,000	30 for higher volume ports 36 for all other locations	36 for higher volume ports 48 for all other locations
W3 (50,000 bbls/day recovery)					
No requirements	1,000 plus 300 per skimming system	50,000	100,000	54 for higher volume ports 60 for all other locations	60 for higher volume ports 72 for all other locations

Boom Properties

Boom height (draft plus freeboard) (inches)	≥ 42
Reserve buoyancy-to-weight ratio	3:1 to 4:1
Total tensile strength (lbs)	> 20,000
Skirt fabric tensile strength (lbs)	500
Skirt fabric tear strength (lbs)	125

Prince William Sound Classification

General

The FRP and VRP regulations establish more stringent planning criteria for owners and operators of tank vessels loading cargo at a facility permitted under the Trans-Alaska Pipeline Authorization Act. OSROs intending to respond in the Prince William Sound, Alaska COTP zone also are classified to that standard.

Additional requirements concerning prepositioned equipment caches are found in 33 CFR 154, Subpart G and 33 CFR 155, Subpart E.

Shallow Water Requirements

General

Depending on the operating area, a certain percentage of OSRO resources must be capable of operating in waters of 6 feet or less (33 CFR 154.1045(e)(5) and 33 CFR 155.1050 (f)(6)), as shown in Table 13. Equipment must be identified in an OSRO's application to meet this requirement.

Table 13. Percentage of Response Equipment Capable of Operating in Shallow Waters

Area	Facility	Tank Vessel
Rivers/Canals	20	20
Great Lakes	20	20
Inland	20	20
Nearshore	20	20
Offshore	10	10
Open Ocean	None	None

OSRO Exercises

Introduction

Both the FRP and VRP regulations require that plan holders conduct annual equipment deployment exercises involving the OSROs listed in their response plans (33 CFR 154.1055(a)(3) and 33 CFR 155.1060(a)(4)).

Although the responsibility for ensuring that these exercises occur rests with the plan holder, an OSRO that is listed as the primary response organization in a response plan desiring to obtain and maintain a classification must participate in and keep documentation of these completed exercises.

PREP Guidelines

The National Preparedness for Response Exercise Program (PREP) guidelines were published in August 1994 and contain a detailed description of exercise requirements.

NOTE: The PREP guidelines can be obtained on-line at *http://www.uscg.mil/hq/g-m/nmc/response/#PREP* or at no cost from:

TASC DEPT
Warehouse 33141Q
75th Avenue
Landover, MD 20785
Fax: (301) 386-5394
Include the following information: Publication Number PREP Guidelines: USCG-X0191 Training: "in printing," Name of Publication Quantity.

Owned, Contracted, or Arranged by Other Means

For OSROs using a combination of owned and contracted resources to meet the requirements for classification, exercises must include both categories of resources working together and integrating separate system components provided by multiple OSROs.

Operating Areas

Exercises must be held in each operating area (rivers/canals, inland, Great Lakes, nearshore, offshore, open ocean) where an OSRO holds a valid classification using equipment appropriate for that area.

Rivers/Canals and Inland

For OSROs holding classifications for both the rivers/canals and inland operating areas, an exercise in one operating area satisfies exercise requirements for both.

Nearshore, Offshore, and Open Ocean

For OSROs holding classifications for nearshore, offshore, and open ocean operating areas, an exercise in one operating area also satisfies exercise requirements for all.

OSRO Exercises, continued

Additional Exercises

In addition to equipment deployment, exercises should include mobilization, transportation, and logistics support aspects, especially as they relate to MMPD and WCD Tier 1 resources.

To the maximum extent practicable, OSROs are encouraged to work with plan holders and the local area committees to hold equipment deployment exercises in conjunction with annual spill management team or Area exercises.

Additionally, whenever possible, OSROs are encouraged to use these exercises as an opportunity to validate response strategies contained in response and contingency plans.

Personnel Training

Required by Response Plans and the Classification Program	The FRP and VRP regulations require plan holders to ensure that response personnel are trained to perform their jobs as listed in the plans (33 CFR 154.1045 and 33 CFR 155.1055). The OSRO classification program requires an OSRO to provide similar assurance.
Program Components	This information need not be a course syllabus, but enough explanation must be provided to demonstrate that an OSRO has identified key skills needed in a response and show that personnel have received the proper training to perform in those areas. An OSRO also should describe the methods in which training is delivered to its personnel. An effective response training program should include, but is not limited to, the following: • Actions to take in accordance with designated job responsibilities • Occupational Safety and Health Administration (OSHA) requirements outlined in 29 CFR 1910.120 • Communications • Training on specific response equipment identified in the OSRO application
Periodic Training	Training must be conducted periodically to reinforce the required knowledge.
Training Records	Training records must be maintained for 3 years following completion of the training. Their location must be noted in the initial classification application, and all records must be available for review during OSRO verification visits.

Equipment Maintenance

Periodic Inspection and Maintenance	An OSRO must ensure that response resources listed in its application are inspected periodically and maintained in good operating condition, in accordance with the manufacturer's recommendations and best commercial practices.
Maintenance Records	All inspections and maintenance must be documented and the records maintained for 3 years. Their location must be noted in the initial classification application, and all records must be available for review during OSRO verification visits.

Chapter 3
Classification Program

Overview

Introduction

Application to the OSRO classification program has two components—Web-based application including the Response Resource Inventory (RRI) and attestment letter. The OSRO may also request the Coast Guard to consider alternative equipment standards and response times. In consultation with applicable COTPs, the NSFCC reviews application packages and any alternative compliance requests.

In This Chapter

This Chapter contains the following information:

Application Process

Voluntary Application

Any OSRO may voluntarily apply for classification. An OSRO must first contact the NSFCC for application materials and instructions (if OSRO does not have Internet access):

Commanding Officer
National Strike Force Coordination Center
ATTN: OSRO Section
1461 North Road Street
Elizabeth City, NC 27909-3241
Tel: (252) 331-6000 / Fax: (252) 331-6012
http://www.uscg.mil/hq/nsfcc/nsfweb/index.html

Web-Based Application and RRI

The OSRO is required to complete a Web-based application package. The Coast Guard uses the RRI computer program to help determine compliance with equipment standards and response times.

Classification is assigned based on the information supplied by each OSRO. Participation in the RRI is mandatory for an OSRO to receive a classification. For an application to be accepted, all pertinent data fields must be completed.

Using the response times, discharge quantities, and equipment requirements specified in the FRP and VRP regulations (33 CFR 154 and 33 CFR 155) and in these guidelines, the NSFCC determines the appropriate classification(s) for each COTP city or ACC requested by an OSRO.

Attestment Letter

In addition to the Web-based application, the OSRO also must provide an attestment letter.

The letter must include, at a minimum, the following information:

- The application is accurate and factual to the best of the submitter's knowledge.
- The OSRO complies with the resource maintenance, personnel training, and exercise requirements outlined in these guidelines.
- The OSRO has all support components needed to deploy the core equipment and the logistics network needed to sustain the resources at an incident for the time periods specified in the FRP and VRP regulations (examples of support components include personnel, boats, anchors, hoses, lines, etc.).
- A statement that agrees to allow the Coast Guard to visit its resource sites for the purposes of verifying the information in the application and its compliance with the provisions of these guidelines.

Continued on next page

Application Process, continued

Attestment Letter, continued

An example of an acceptable attestment letter, with the required information, is shown in Figure 1.

Figure 1. Sample Attestment Letter

I, the undersigned, attest to the fact that to the best of my knowledge, the response resource information contained in this application is accurate and factual. This company and all subcontractors identified in this application maintain, inspect, and operate the response equipment in accordance with the manufacturer's recommendations and best commercial practices. All inspection and maintenance is documented, and records are maintained for 3 years. Company response personnel and all subcontractors identified in this application, including volunteers when used, are trained sufficiently, in accordance with Occupational Safety and Health Administration (OSHA) standards for emergency response operations in 29 CFR 1910.120, to operate the equipment included in this application. These records are maintained for a period of no less than 3 years. This company and all subcontractors identified in this application meet or exceed the exercise requirements as outlined in the PREP guidelines for each plan in which it is listed, and documentation to this effect is maintained for 3 years and is available for verification. The company and all subcontractors also agree to be visited by Coast Guard personnel for the purpose of verifying the information contained therein.

Alternative Compliance Methods

Request for Alternative Compliance

OSROs may request the Coast Guard to consider alternative standards to the ones presented in these guidelines. The request must be submitted in writing to the NSFCC.

Alternative Compliance Standard in Response Plan Regulations

The alternative compliance standards that will be considered are those allowed within the FRP and VRP regulations, as outlined in Table 14.

Table 14. Acceptable Alternative Standards and Regulatory Cites

	Section in Response Plan Regulations	
Category	Facility 33 CFR 154	Tank Vessels 33 CFR 155
EDRC	Appendix C, Section 6.3	Appendix B, Section 6.3
Travel Speed	Appendix C, Section 2.6	Appendix B, Section 2.6
TSC	Appendix C, Section 9.2	Appendix B, Section 9.2
Boom	No cite; based on ACP	Appendix B, Table 2

Request for Alternative Response Times

OSROs may request approval for alternative response time standards (notification, mobilization, and travel time).

Time in Effect

Alternative compliance methods that are approved will remain in effect for 3 years.

After 3 years, the Coast Guard reviews the alternative compliance method to ensure that the reasons for its approval remain valid. If the Coast Guard finds that circumstances have changed and the alternative compliance method is no longer valid, then it may be rescinded.

Review Process

Application Package	An applicant's resources, narratives, and attestment letter—provided as a completed application package—are reviewed and evaluated for classification by the OSRO Section of the NSFCC. Incomplete packages are returned for completion.
Consultation with COTP(s)	As part of the application review, the NSFCC consults with the applicable COTP(s) where an OSRO is requesting classification.
Classification Letter and Profile	After the review is completed, the Commanding Officer of the NSFCC issues a classification letter to an applicant. The letter includes a classification profile that provides information on classification levels and coverage.
Appeal of Classification Decision	If an OSRO does not agree with the classifications determined by the NSFCC, it may request a reconsideration of the classification decision. If the NSFCC does not adequately address its concern, an OSRO may submit a written appeal to the OSRO Program Manager at Coast Guard Headquarters: Commandant (G-MOR-3) U.S. Coast Guard ATTN: OSRO Program Manager 2100 Second Street, S.W. Washington, DC 20593-0001

Chapter 4
Verification Process

Overview

Introduction

The verification process encompasses the initial site visit plus periodic visits. During the resource verification visit, the Coast Guard ensures that resources are consistent with the OSRO's classification, examines equipment systems, and reviews its maintenance and training programs.

In This Chapter

This Chapter contains the following information:

Verifications

Resource Verification Visit

The Coast Guard visits each site that an OSRO has included in an application to conduct a resource verification visit after a classification letter has been issued.

A standard checklist is used to conduct the verification.

Purpose

- Verify the resources identified in the application.
- Complete a visual equipment survey of the material condition of the response resources.
- Ensure the response resources are properly maintained and maintenance is documented.
- Ensure the OSRO has sufficient personnel available and trained to mobilize, deploy, and operate the equipment identified in the OSRO application; that personnel meet the Hazardous Waste Operations and Emergency Response (HAZWOPER) requirements in 29 CFR 1910.120; and that such is documented.
- Verify a cross-section of the inventory for systems operability and logistics support capability.
- Review records of participation in exercises.
- Review the site's logistics narrative (where applicable) and determine the status of the support services listed in the narrative (e.g., equipment rentals, commercial drivers, and personnel services, etc.) and their ability to mobilize and sustain the resources there.

Resources Consistent with Classification

To determine whether the OSRO's resource amounts are consistent with the classification level, the Coast Guard conducts a crosscheck of the OSRO's resource amounts to those required by the appropriate classification level.

Examination of Equipment Systems

When completing the visual equipment survey, the Coast Guard examines a number of equipment systems from each response resource category that reflects a cross-section of the inventory on-site.

The examination keys on whether the equipment is working and deployable. An OSRO is expected to ensure that all systems that count toward classification are in working order and able to be deployed into the marine environment. The OSRO may be required to operate one or more systems for the inspectors.

NOTE: If the verification deployment's scope is equal to that required by the PREP guidelines for an equipment deployment, an OSRO might gain credit toward that requirement if all other criteria are met.

Continued on next page

Verifications, continued

Deficiency	If the system(s) does not have all its parts or cannot operate, the Coast Guard may allow the OSRO to retain its classification, so long as the deficiency does not significantly affect the OSRO's overall response readiness. The Coast Guard, however, examines additional systems. If those systems fail the inspection, the Coast Guard considers this sufficient evidence to indicate a trend in response resource deficiency and immediately reduce or revoke the OSRO's classification.
Correction	An OSRO then has 14 days to correct the deficiency, at which time the Coast Guard may conduct a second OSRO site verification to determine whether to restore the original classification.
Review of Maintenance Program	The inspectors review the OSRO's maintenance program to ensure that the equipment is properly maintained. The verification team may consider, among other conditions, the following:
Booms	• Overall condition • Evidence of ownership, lease, or subcontract • Manufacturer, type, and quantity • Compatibility of connectors • Number and adequacy of anchors • Transportability • Planned operating area(s)
Recovery Devices (Skimmers and Vacuum Trucks)	• Evidence of ownership, lease, or subcontract • Manufacturer, type, model, and throughput capacity • Compatibility of components (hoses, suction and skimmer head, couplings, connectors, etc.) • Operability and maintenance • Condition of the prime mover and other supporting equipment • Holding capacity • Planned operating area(s)

Continued on next page

Verifications, continued

Oil Spill Response Vessels (Skimmers, Barges, and Support Craft)	• Evidence of ownership, lease, or subcontract • Operability and maintenance • Storage capacity • Inspection/certification • Planned operating areas • Grade of oil carried • Offload capability • Length, beam, draft, range, transit speed, and crew size
Temporary Storage Devices	• Evidence of ownership, lease, or subcontract • Manufacturer, type, and model (as applicable) • Capacity (twice the daily capacity of recovery devices) • Inspected and maintained in accordance with manufacturer's recommendations • Contracted barges with current certificates • Planned operating areas • Grade of oil carried • Location of fixed storage
Boats	• Sufficient numbers of trailers, outboard motors, and Coast Guard-required safety equipment (life jackets, lights, etc.) • Types and number of boats appropriate to the area of classification • Operability and maintenance • Length, beam, draft, range, transit speed, and crew size • Adequate working platform for oil spill response • Certification/registration
Records	• Equipment clearly marked for identification • Records supporting claims of ownership, lease, or subcontract • Complete maintenance records reflecting condition of equipment • Personnel training records • Exercise records
Verification of Training	Through documentation, discussions, and informal interviews, the Coast Guard verifies that all response personnel at the resource site are trained in accordance with HAZWOPER (29 CFR 1910.120) and the OSRO's internal training program. Prior to the Coast Guard's visit, the OSRO should check personnel records and subcontracting or consulting agreements to verify the number and availability of trained personnel listed in the application.

Verifications, continued

Logistics Narratives

An OSRO may be asked to provide a written narrative outlining the logistics requirements for each resource site used in its application. The logistics narrative is best presented using the Resource Site(s) Worksheet (Figure 2); however, any format may be used.

Narratives must provide enough information to document that an OSRO has considered the myriad and complex logistics support requirements for the mobilization and delivery of the response equipment and personnel from each resource site to each COTP city or ACC requested. Narratives should contain, but are not limited to, the following:

- Methods of personnel recall (if applicable)
- Methods of loading resources for mobilization
- Methods of resource transport off-site to incident or staging area
- Methods of mobilizing, deploying, and supporting resources
- Special response resources staging (e.g., prepackaging, palletizing, preloading)
- Necessary site support services (e.g., tractors, trailers, drivers, cranes, etc.)

Appeal of Verification Visit

An OSRO that disagrees with the results of a verification visit may appeal in writing to the Commanding Officer of the NSFCC within 30 days of the visit.

If the OSRO remains unsatisfied with the determination after the appeal, a second appeal may be made to Coast Guard Headquarters (see Chapter 3 Classification Program, Section Review Process for contact information).

Consultation with COTP(s)

After consulting with the applicable COTP(s), classifications can be revoked or altered by the Commanding Officer of the NSFCC. Some reasons for revoking or altering a classification include:

- Resources identified in an OSRO application could not be verified.
- Available response resources do not match the classification levels.
- Response resources are unable to meet response times or do not function properly during drills, exercises, responses, and/or inspections.
- OSRO fails to meet the training, maintenance, and exercise provisions of these guidelines.

Verifications, continued

Figure 2. Resource Site(s) Worksheet

1. OSRO Name:				2. Submitted by:			3. Phone Number:	
4. Date:	5. COTP Zone	7. Time Requirements (hours)			M	W1	W2	W3
		6. Operating Area		Vessel				
				Facility				

8. Site Location	9. Response Personnel	10. Response Resource	11. Resource Status	12. Assigned Notification/Mobilization Time	13. Travel Speed	14. Travel Distance (miles/ nautical miles)	15. Travel Time (hours)	16. Total Response Time (hours)

17. Comments/Narrative

1. Company name and number
2. Name of submitter
3. Phone number of submitter
4. Date of application/narrative
5. COTP Zone in which OSRO intends to operate
6. Operating area in which OSRO intends to operate
7. Per these guidelines
8. City where the resource site is located
9. Name(s) of resource personnel
10. Name(s) or type(s) of resource by group
11. Per Table 6 in these guidelines
12. Per Table 6 in these guidelines
13. 35 mph for land or 5 kts for water
14. Travel distance to the COTP city/ACC or given response location.
15. Block 14 ÷ Block 13
16. Block 15 + Block 12
17. Additional information may assist in evaluating each site's response readiness, such as personnel recall methods, resource staging methods (palletizing, packaging), availability of transport vehicles (owned, contracted), and mobilization and deployment support service requirements for the site as well as the COTP city/ACC requested.

Reverifications

Periodic Reverification	After the initial verification visit, an OSRO undergoes a periodic reexamination.
Additional Reverification	Other than periodic reexaminations, reverifications may also occur for the following reasons: • Unsatisfactory verification visit • COTP request • OSRO's poor performance during spill or exercises • OSRO request • Change in ownership • Other reasons

Chapter 5
Additional Program Requirements

Overview

Introduction	A classified OSRO is required to notify the Coast Guard of any changes in its capability and to review its resource information annually.
Notice of Change in Capability	Once classified, an OSRO must report any significant changes made to its response resources to the NSFCC and COTP within 72 hours. Significant changes are defined as a reduction in the OSRO's classified capacity by a factor of 10% or greater, for a period of 48 hours or longer.
Annual Review	Each OSRO issued a classification letter by the NSFCC must annually review and verify that the resource information submitted for the original classification remains accurate, and that the equipment maintenance, personnel training, and exercises have been completed. On completion of this review, the OSRO submits documentation to the NSFCC of the annual review. If any resource, maintenance, or training changes have occurred, the OSRO provides this information to the NSFCC so that their classifications can be updated as appropriate.

Acronyms

ACC	Alternate Classification City
ACP	Area Contingency Plan
bbl	barrel
CFR	Code of Federal Regulations
COTP	Captain of the Port
EDRC	effective daily recovery capacity
EEZ	Exclusive Economic Zone
FHVP	facility higher volume port
FRP	facility response plan
FWPCA	Federal Water Pollution Control Act
HAZWOPER	Hazardous Waste Operations and Emergency Response
kts	knots
LOI	letter of intent
MMPD	maximum most probable discharge
mph	miles per hour
NSFCC	National Strike Force Coordination Center
OPA 90	Oil Pollution Act of 1990
OSHA	Occupational Safety and Health Administration
OSRO	oil spill removal organization
PREP	National Preparedness for Response Exercise Program
RRI	Response Resource Inventory
TSC	temporary storage capacity
USC	U.S. Code
VHVP	vessel higher volume port
VRP	vessel response plan
WCD	worst case discharge

Glossary

Alternate Classification City (ACC)	A designated geographic location along the U.S. coastline used in addition to or in lieu of a COTP city for an OSRO classification. The following cities are identified as ACCs: Marquette, MI; Coos Bay, OR; Eureka, CA; Traverse City, MI; Alpena, MI; Oswego, NY; Cape Canaveral, FL; Morro Bay, CA; and Panama City, FL.
Area Contingency Plan (ACP)	The plan prepared by an Area Committee in part to address removal of a WCD and to mitigate or prevent a substantial threat of such a discharge from a vessel, offshore facility, or onshore facility operating in or near an area designated by the President of the United States.
Captain of the Port (COTP) Zone	A zone specified in 33 CFR 3 and, for coastal ports, the seaward extension of that zone to the outer boundary of the EEZ.
Classification	A process for identifying OSRO capability within geographic locations on the basis of its ownership and/or control of specialized equipment and trained personnel used in the removal of oil from the area.
Containment Boom	Boom that is used to collect and hold oil on the surface of the water for recovery by skimmers or similar collection devices. The regulations require containment boom equal to 1,000 feet or twice the length of the largest vessel served, plus sufficient boom for the efficient operation of recovery devices. For classification, an OSRO is expected to have 1,000 feet of containment boom for each operating area in which it operates, plus 300 feet of containment boom for each recovery system used in its classification.
Contract	A written contractual agreement between the OSRO and its subcontractors. The agreement must identify and **ensure** the availability of specified personnel and response equipment, within stipulated response times, in the specified geographic areas.
Dedicated Response Resources	Equipment and personnel dedicated primarily to oil spill response, cleanup, and spill containment. Such equipment and personnel are not utilized for any other activity that would affect their ability to provide oil spill response services adversely.

Glossary, continued

Field Response Facility	See Resource Site.
Effective Daily Recovery Capacity (EDRC)	The calculated capacity of oil recovery devices as determined by using a formula defined in 33 CFR 154, Appendix C and 33 CFR 155, Appendix B that accounts for limiting factors such as daylight, weather, sea state, and emulsified oil in the recovered material.
Exclusive Economic Zone (EEZ)	The zone contiguous to the territorial seas of the United States, extending to a distance up to 200 nautical miles from the baseline from which the breadth of the territorial seas is measured.
Great Lakes	Operating area that includes Lakes Superior, Michigan, Huron, Erie, and Ontario; their connecting and tributary waters; the Saint Lawrence River as far as Saint Regis; and adjacent port areas.
Higher Volume Port Areas	Ports listed in 33 CFR 154.1020 and 33 CFR 155.1020, including any water area within 50 nautical miles seaward of the port.
Inland	The operating area shoreward of the boundary lines (except in the Gulf of Mexico) defined in 46 CFR 7. In the Gulf of Mexico, it means the area shoreward of the line of demarcation (COLREG lines) as defined in Sections 80.740–80.850 of 33 CFR Chapter I. The inland operating area does not include the Great Lakes.
Letter of Intent (LOI)	A document that identifies the personnel, equipment, and services capable of being provided by another commercial source to the OSRO within the stipulated response times in the specified geographic areas. It sets out the parties' acknowledgement that the commercial source **intends to commit** the resources in time of a response and that they agree to permit the Coast Guard to verify the availability of the identified response resources through notification drills, review of contracts, and site visits.
Maximum Most Probable Discharge (MMPD)	• For a facility, a discharge of 1,200 barrels or 10% of the volume of a WCD, whichever is less. • For a tank vessel with a capacity equal to or greater than 25,000 barrels of oil, a discharge of 2,500 barrels. • For a tank vessel with a capacity of less than 25,000 barrels, a discharge of 10% of the tank vessel's oil cargo capacity.

Glossary, continued

Mobilization	The time it takes to get the resources assembled and prepared at the staging site. Mobilization begins when notification ends and ends when the resources are ready to move off-site.
Nearshore	The operating area extending seaward 12 nautical miles from the boundary lines (except in the Gulf of Mexico) defined in 46 CFR 7. In the Gulf of Mexico, it means the area extending seaward 12 nautical miles from the line of demarcation (COLREG lines) as defined in Sections 80.740–80.850 of 33 CFR Chapter I.
Nondedicated Response Resources	Response resources with service that is not limited exclusively to oil or hazardous substance spill response-related activities.
Non-Persistent or Group I Oil	A petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions: • At least 50% of which by volume distills at a temperature of 340°C (645°F) • At least 95% of which by volume distills at a temperature of 370°C 700°F)
Ocean	The nearshore, offshore, and open ocean operating areas as defined in these guidelines.
Offshore	The operating area up to 38 nautical miles seaward of the outer boundary of the nearshore area (12–50 miles).
Oil Spill Removal Organization (OSRO)	Any person or persons who owns or otherwise controls oil spill removal resources that are designed for, or are capable of, removing oil from the water or shoreline. Control of such resources through means other than ownership includes leasing or subcontracting of equipment or, in the case of trained personnel, by having contracts, evidence of employment, or consulting agreements. OSROs provide response equipment and services, individually or in combination with subcontractors or associated contractors, under contract or other means approved by the President, directly to an owner or operator of a facility or tank vessel required to have a response plan under 33 USC 1321(j)(5). OSROs must be able to mobilize and deploy equipment or trained personnel and remove, store, and transfer recovered oil. Persons such as sales and marketing organizations (e.g., distributorships and manufacturer's representatives) that warehouse or store equipment for sale are not OSROs.

Glossary, continued

Open Ocean	The operating area seaward of the outer boundary of the offshore operating area to the seaward boundary of the EEZ (50–200 miles).
Operating Area	Rivers/canals, Great Lakes, inland, nearshore, offshore, or open ocean. These terms are used to define the geographic location(s) in which a facility or tank vessel is handling, storing, or transporting oil.
Operating Environment	Rivers/canals, Great Lakes, inland, or ocean. These terms are used to define the conditions in which response equipment is designed to function.
Other Approved Means	For the purposes of these guidelines, means an LOI as defined in this Glossary.
Owned Resources	Equipment that belongs solely to the OSRO or personnel directly employed by the OSRO submitting an application for classification.
Persistent Oil	A petroleum-based oil that does not meet the distillation criteria for a non-persistent oil. For the purposes of these guidelines, persistent oils are further classified based on specific gravity as follows: • Group II: specific gravity less than 0.85 • Group III: specific gravity between 0.85 and less than 0.95 • Group IV: specific gravity 0.95 to and including 1.0 • Group V: specific gravity greater than 1.0
Protective Boom	Boom used for deflecting/diverting or otherwise influencing oil on the water surface away from sensitive environments, often but not always toward containment sites.
Resource Site	A location where personnel and pollution response equipment are staged.
Response Resource Inventory (RRI)	The database of oil spill response resources developed by the Coast Guard to meet requirements of the OPA 90.
Response Resources	The personnel, equipment, supplies, and other capabilities necessary to perform the response activities identified in an FRP or VRP.
Rivers/canals	Operating area that includes bodies of water confined within the inland area, including the Intracoastal Waterways and other waterways artificially created for navigation, that have a project depth of 12 feet or less.

Glossary, continued

Shallow-Draft Capable	Equipment is capable of operating in waters of 6 feet or less depth.
Skimming Systems	Devices used to remove spilled oil from the surface of the water through means of mechanical suction, adhesion, absorption, adsorption, or some similar mechanism of action that allows separation and recovery of spilled oil from the water's surface. Skimmers may be self-propelled, towed, or pushed through the water.
Systems Approach	An assessment of the infrastructure and support resources that an OSRO must have to mobilize, transport, deploy, sustain, and support the equipment resources necessary for the level of response for which classified (response readiness, trained personnel, personnel recall mechanisms, trucks, trailers, response vessels, etc.).
Temporary Storage Capacity (TSC)	Inflatable bladders, rubber barges, certificated barge capacity, or other temporary storage that is capable of being utilized on-scene at a spill response and is designed and intended for storage of flammable or combustible liquids. It does not include tank vessels or barges-of-opportunity for which no prearrangements have been made. Fixed shore-based storage capacity, ensured available by contract or other approved means, is acceptable in limited circumstances.
Tiers 1, 2, and 3	The combination of response resources and the times within which the resources must be capable of arriving on-scene to meet WCD resource requirements as defined in 33 CFR 154.1020 and 33 CFR 155.1025.
Worst Case Discharge (WCD)	In the case of an onshore facility and deepwater port, the largest foreseeable discharge in adverse weather conditions. In the case of a tank vessel, a discharge, in adverse weather conditions, of a tank vessel's entire oil cargo.